

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW MEXICO

UNITED STATES OF AMERICA,)
)
Plaintiff,) CRIMINAL NO. 19-1631 DHU
)
vs.)
)
KAMAL BHULLA, et al.)
)
Defendant.)

MOTION FOR APPOINTMENT OF COUNSEL

The United States respectfully moves this Court to appoint counsel for V.C. and M.C., sisters who were employed at the Best Choice Inn and that the United States intends to call at trial. To protect the fundamental rights afforded to V.C. and M.C. by the Fifth Amendment, and to prevent any unnecessary delay in trial if an issue should arise concerning the substance of their testimony, the United States asserts that it is just and necessary for V.C. and M.C. to confer with counsel prior to their testimony.

Although this motion does not seemingly implicate the fundamental rights of the Defendants in any detectable way, the United States nevertheless sought their respective positions. Counsel for Defendant Craft opposes the motion. Counsel for Defendant Patel has no objection.

WHEREFORE, the United States respectfully requests that the Court appoint counsel to M.C. and V.C.

Respectfully submitted,

ALEXANDER M.M. UBALLEZ
United States Attorney

/s/ April 13, 2023

LETITIA CARROLL SIMMS
JACK BURKHEAD
Assistant United States Attorney
PO Box 607
Albuquerque, NM 87103
(505) 346-7274